

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

**PROPOSED ALLOCATION OF TIME AND ORDER OF PRESENTATION
OF ELIGIBILITY OBJECTIONS AT THE OCTOBER 15, 2013
SCHEDULED HEARING**

Pursuant to section IV of the First Amended Order Regarding Eligibility Objections Notices of Hearings and Certifications Pursuant to 28 U.S.C. § 2403(a) & (b) [Dkt. No. 821] (the “Eligibility Objection Scheduling Order”), the proposed allocation of time and the order of presentation of eligibility objections at the October 15, 2013 scheduled hearing is as follows:

- 1) 10:00 a.m. – 12:00 p.m.

Order of Presentation ¹	Allocated Time	Objector Presenting
	Introduction	Robert D. Gordon
1.	35 minutes	AFSCME
2.	35 minutes	Retiree Committee
3.	10 minutes	Retired Detroit Police Members Association

¹ The Order of Presentation does not strictly correspond to the issues identified by number in the Amended Eligibility Scheduling Order.

4.	10 minutes	David Sole
5.	5 minutes	Krystal Crittendon
6.	5 minutes	Retiree Association Parties
7.	5 minutes	Center for Community Justice and Advocacy

2) 1:30 p.m. – 3:00 p.m.

Order of Presentation	Allocated Time	Objector Presenting
1.	35 minutes	Detroit Retirement Systems
2.	35 minutes	UAW
3.	5 minutes	Flowers Plaintiffs
4.	10 minutes	Detroit Public Safety Unions

The above proposal is based upon several conversations among the objecting parties. The proposal was circulated to all counsel of record for the objecting parties by electronic mail on October 14, 2013 at 12:28 p.m. (Eastern). As of 2:00 p.m. on October 14, 2013, the following objecting parties have affirmatively agreed to, or have not opposed, this proposal: (1) the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit; (2) Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees; (3) the Official Committee of Retirees; (4) International Union, United Automobile, Aerospace and Agricultural Implement Workers of America; (5) Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman; (6) Retired

Detroit Police Members Association; (7) Retired Detroit Police & Fire Fighters Association, Donald Taylor, the Detroit Retired City Employees Association, and Shirley V. Lightsey; (8) The Detroit Fire Fighters Association, the Detroit Police Officers Association, the Detroit Police Lieutenants & Sergeants Association, and the Detroit Police Command Officers Association; (9) David Sole; (10) Center for Community Justice and Advocacy; (11) Local 324, International Union of Operating Engineers and Local 517M, Service Employees International Union; and (12) Krystal Crittendon.

The above identified parties have affirmatively agreed to, or have not opposed, the following language: Because the objecting parties as a group are required to comply with the time limits for the oral argument established in the [Eligibility Objection Scheduling Order], some of the objecting parties may be limited in their oral argument on particular legal objections. Therefore, the fact that an objecting party did not present oral argument on a particular legal objection does not constitute a waiver of any written objection made by that party or the right to rely on the arguments of the other objectors.

Respectfully submitted,

CLARK HILL PLC

/s/ Robert D. Gordon

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Date: October 14, 2013